



**RFA Testimony at USDA Virtual Listening Session on the Inflation Reduction Act
November 3, 2022
Jared Mullendore, Director of Government Affairs
(As Prepared)**

Good afternoon, my name is Jared Mullendore, and I am the Director of Government Affairs for the Renewable Fuels Association, or RFA. RFA is the leading trade association for America's ethanol industry.

We would first like to thank you for holding this session and your openness to engaging with stakeholders.

RFA has helped 39 companies in 21 states apply successfully for HBIIP funding resulting in the installation of over 1,500 dispensers and 151 underground storage tanks at over 200 locations. This enables the distribution of 138 million additional gallons of low-carbon ethanol annually.

First, we feel that lengthening the application window from 90 days to 6 months would significantly boost the program's overall success. Stakeholders begin at a time of disadvantage because we cannot promote the program until the application window opens. This leaves a smaller window to apply because most interested parties don't learn about the grant until weeks after it is posted. It also takes time to gather all the information necessary to apply, decreasing our window of opportunity even more.

Additionally, we would encourage USDA to consider raising the dollar limits per entity, so that larger chains with many stations can take full advantage of the expanded funding under the IRA.

Next, higher blends, including E85, represent a huge opportunity for HBIIP. Many BIP and HBIIP investments have supported both E15 AND E85 infrastructure. However, there is a lack of attention from both automakers and EPA on the potential of Flex Fuel Vehicles to decarbonize transportation fuel. We encourage USDA to engage with EPA and the White House on opportunities to promote growth in FFV production and use.

Likewise, federal fleets represent a huge opportunity for deployment of higher blends because they already own and operate many FFVs.

Another area with tremendous potential is sustainable aviation fuel. RFA sees a bright future for sustainable aviation fuel and would like to see airport and aircraft refueling infrastructure included in HBIIP in addition to rail and marine infrastructure.

Across the program, RFA appreciates USDA's streamlining of the environmental review process and we encourage this to continue moving forward.

Finally, although we feel demand for HBIIP is strong, year-round nationwide availability of E15 would unlock even more demand. RFA encourages USDA to work with the White House, EPA, and others in the administration to support RVP parity so that E15 can be sold in conventional gasoline markets year-round.

On a separate note, RFA's members have utilized the REAP program for a variety of projects and technologies. We see REAP playing an important role in reaching our goal of net zero ethanol by 2050 or before by accelerating investment in both new and established low carbon technologies. We would like to encourage USDA to utilize REAP as a vehicle to invest in low-carbon technologies both at the farm and biorefinery levels.

Thank you for this opportunity to comment. RFA will submit written comments expanding on the ideas I have raised today.

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